

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW MEXICO**

No. CV 10-133 DJS/ACT

**DONNA J. HILL,
On Behalf of Herself and All Other Similarly
Situating or, Alternatively, on Behalf of the New
Mexico Educational Retirement Fund and its
Members and Beneficiaries**

Plaintiff,

v.

**VANDERBILT CAPITAL ADVISORS, LLC,
VANDERBILT FINANCIAL, LLC, VANDERBILT
FINANCIAL TRUST, PIONEER INVESTMENT
MANAGEMENT, U.S.A., INC., BRUCE MALOTT,
GARY BLAND, VERONICA GARCIA, DOUGLAS
M. BROWN, PATRICK LIVNEY, OSBERT M. HOOD
STEPHEN C. BERNHARDT, KURT W.
FLORIAN, JR., ANTHONY J. KOENIG, JR.,
MARK E. BRADLEY, RON D. KESSINGER,
ROBERT P. NAULT, JAMES R. STERN, NEW
ENGLAND PENSION CONSULTANTS, LLC,
ALDUS EQUITY, SAUL MEYER, JOE DOE #1
JOHN DOE #2, DOES 3-100, inclusive**

Defendants.

DEFENDANT NEPC, LLC's MOTION FOR ADMISSION PRO HAC VICE

COMES NOW Defendant New England Pension Consultants, LLC ("NEPC"), by and through its New Mexico counsel, and moves this Court for an Order allowing Roberto M. Braceras and Jennifer L. Chunias to appear in this action along with resident counsel from Comeau, Maldegen, Templeman & Indall, LLP, as its counsel. In support of this motion, NEPC states:

1. Michael R. Comeau, a licensed New Mexico attorney in good standing with the New Mexico bar and admitted to practice before this Court, requests that Roberto M. Braceras and Jennifer L. Chunias be permitted to practice in association with him in this action.

2. Mr. Braceras is a partner with the firm of Goodwin Procter LLP, located in Boston, Massachusetts. He received his law degree in 1994 from Yale Law School. He is in good standing with, and admitted to practice in, the state and federal courts of Massachusetts, the New York Supreme Court, the United States District Courts for the Southern District of New York, the District of New Jersey, the District of Connecticut, and before several United States Courts of Appeal.

3. Ms. Chunias is also a partner with the firm of Goodwin Procter. She received her law degree in 1999 from the Northeastern University School of Law. She is in good standing with, and admitted to practice in, the state and federal courts of Massachusetts, the United States District Court for the District of Connecticut, and state courts in Connecticut, New Jersey and New York.

4. Neither Mr. Braceras nor Ms. Chunias has any disciplinary actions pending against them, nor are they under any administrative restriction for the practice of law. As co-counsel for Defendant NEPC, they will be associated with New Mexico counsel. Michael R. Comeau will continue to participate in this action as resident attorney.

5. An Order approved by Plaintiff's counsel accompanies this motion.

COMEAU, MALDEGEN, TEMPLEMAN
& INDALL, LLP

By: s/ Electronically Filed
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*Attorneys for Defendant New England
Pension Consultants, LLC*

CERTIFICATE OF SERVICE

On February 18, 2010, the foregoing was transmitted to all counsel of record by the Court's electronic filing system.

s/

Michael R. Comeau

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